

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHAD STANBRO,
Plaintiff,

-
-against-

WESTCHESTER COUNTY HEALTH
CARE CORPORATION, WESTCHESTER
MEDICAL CENTER, FRANK WEBER and
JOHN FULL,
Defendants.

7:19-cv-10857-KMK

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X
CHAD STANBRO,
Plaintiff,

-against-

CORRECTION OFFICER NADYA PALOU,
CORRECTION OFFICER RAYMOND DEAL,
CORRECTION OFFICER KRISTOFER LEONARDO,
CORRECTION OFFICER RICHARD LANDRY,
CORRECTION NURSE GARY PAGLIARO and
CORRECTION SERGEANT ENRIQUE TORRES,

-
7:20-cv-01591-KMK

Defendants.

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DECLARATION OF JEB HARBEN

I, JEB HARBEN, an attorney duly admitted to practice law in this Court, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am an Assistant Attorney General in the Office of LETITIA JAMES, Attorney General, State of New York, attorney for the Defendants Leonardo, Landry, Pagliaro, and Torres.
2. I submit this declaration and the annexed exhibits in support of Defendants' Motions In Limine.

3. Attached as Exhibit A is a true and correct copy of a print-out from the DOCCS website containing sentencing and release information regarding Plaintiff.

4. Attached as Exhibit B is a true and correct copy of excerpts from the April 29, 2021 deposition of Defendant Nadya Palou.

5. Attached as Exhibit C is a true and correct copy of excerpts of medical records produced in this action (Bates Nos. 066, 069, 076).

Executed: New York, New York

June 6, 2022

/s/Jeb Harben

JEB HARBEN